



NATIONAL PARK SERVICE ENVIROFACTS

3/3/99

National Park Service
Hazardous Waste Management &
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LEAD-BASED PAINT MANAGEMENT

DEFINITIONS

Lead Based Paint (LBP): Paint containing greater than 0.5 % lead by weight or 1.0 milligram per square centimeter by area. LBP was commonly used prior to 1978. In 1978 LBP's sale for consumer use was banned. LBP may be present in park buildings, bridges, water towers, signs, playground, picnic facilities, and historic structures.

APPLICABLE STANDARDS

Federal: 40 CFR 261-272 established identification, handling and disposal requirements for hazardous wastes including lead containing wastes.

The Residential Lead-Based Paint Hazard Reduction Act of 1992 (Title X of the Housing and Community Development Act) established various programs for reducing exposures to lead, principally in paint.

29 CFR 1926 established permissible exposure limits and associated health and safety requirements for workers involved in LBP activities.

40 CFR 745 established a program for the instruction and certification of workers involved in LBP activities in **target housing** (i.e. housing other child constructed prior to 1978) and child occupied facilities. Certification requirements for LBP work in public and commercial buildings and on steel structures are being developed.

State: States may have particular solid waste and hazardous waste requirements for LBP wastes. States are also responsible for the training and certification of LBP workers under 40 CFR 35. Each park should review state requirements.

Other: National Park Service guidance titled "Health Hazards of Asbestos, Lead, and Radon Gas in NPS Housing" (July 21, 1997) provides specific policies and procedures to be followed in the management of LBP at parks.

HANDLING

Handling requirements for hazardous LBP wastes vary based on the park's hazardous waste generator status and state specific requirements. State and federal requirements regarding container labeling and management, and secondary containment must be met. Additionally, special precautions such as the use of personal protective equipment (PPE) and other procedure to prevent injury may be necessary in handling these wastes. The Park or Regional Safety Officer must be consulted for additional information concerning proper handling.

Dry wastes may be drummed or double bagged. Liquid and semi-liquid wastes must be drummed.

Larger pieces must be wrapped in plastic and sealed.

As a good practice to minimize lead hazards, similar handling procedures should be followed for nonhazardous solid LBP wastes. Sewer disposal of nonhazardous LBP liquid wastes must be conducted in compliance with applicable state and local wastewater discharge permits and regulations.

STORAGE

Lead waste must be stored in accordance with state hazardous waste rules.

DISPOSAL

LBP related waste may consist of paint chips, lead contaminated dust or soil and demolition debris. Lead contaminated wash water may also be hazardous or require special handling. A toxicity characterization leaching procedure (TCLP) test on the waste must be conducted to determine if the material is characteristically hazardous (40 CFR 261.24).

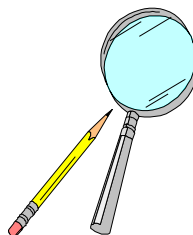
The Environmental Protection Agency (EPA) is developing new guidance on the hazardous waste characterization of demolition debris. EPA guidance procedures should be used when available.

Hazardous and nonhazardous LBP waste must be transported by an appropriately licensed vendor and disposed in a permitted hazardous or nonhazardous landfill, as appropriate based on the waste characterization. LBP waste should not be incinerated.

SPECIAL TOPICS

Lead Identification & Abatement

Title X Requirements:
Title X requires inspection and disclosure of the presence of LBP in all "targeted housing" to be sold or otherwise disposed by parks. In facilities constructed prior to 1960, the LBP must be abated.



Action Plan: The National Park Service has implemented a comprehensive LBP action plan identification and management/abatement of LBP in housing. Individual parks should ensure that their housing are being addressed in this program. When feasible, the LBP action plan should include

other facilities constructed prior to 1978 where the presence of LBP may be a hazard to children and/or maintenance or demolition/renovation workers.

Certified Personnel: Inspectors, risk assessors and abatement workers for targeted housing and child occupied parks must be certified through a state or EPA accredited program (40 CFR 745). The use of certified personnel for work in public buildings and structures is good practice and may become a future requirement.

Worker Protection: OSHA worker safety requirements for lead (26 CFR 1926.62) must be followed when conducting any LBP related activities including maintenance work.

Hazards

LBP hazards may be in the form of child ingestible paint and paint chips, ingestible or inhale-able dust caused by paint deterioration or disturbance, and lead contaminated soil or dust which may be ingested or inhaled.

Recordkeeping

The park is responsible for maintaining files associated with the hazardous waste characterization, transport and disposal of LBP wastes. LBP inspection, risk assessment and abatement reports, and up-to-date management plans should be permanently maintained.

Other Lead Waste Materials

Lead may be found in other equipment and materials at parks including electrical batteries and plumbing. These materials should be handled in accordance with applicable regulatory requirements.

ENVIROFACT X-REFERENCES

- Environmental Training
- Hazard Communication
- Hazardous Waste Characterization

LEAD-BASED PAINT MANAGEMENT CHECKLIST

Checklist Item	Notes
1. Determine whether your state has adopted more stringent standards for facilities that manage lead-based paint (LBP) and generate, collect, transport, or dispose LBP related wastes.	
2. Ensure that a hazardous waste characterization is conducted for LBP wastes generated at the park. (i.e. TCLP analysis).	
3. Confirm that LBP wastes are properly handled as hazardous or nonhazardous based on the results of the TCLP analysis (i.e. "Hazardous Waste" labeling, container management, provision of secondary containment, storage with compatible wastes, storage for allowable times based on generator status).	
4. Ensure that licensed hazardous waste or nonhazardous waste transporters are utilized as appropriate based on the LBP waste characterization.	
5. Verify that LBP wastes are disposed at licensed hazardous or nonhazardous landfills, as appropriate, and in accordance with state and federal requirements.	
6. Ensure that records of LBP waste characterization, transport and disposal are maintained at the park.	
7. Ensure that hazardous LBP wastes are included with other hazardous waste reports submitted to state and federal agencies.	
8. Ensure that OSHA worker safety requirements are met for any activity which may involve exposure to LBP including general maintenance (e.g. HVAC duct cleaning, sanding and painting, etc.) and inspection/abatement.	